

Petition of Massachusetts Electric)
Company pursuant to G.L. c. 164,)
section 76 and 220 CMR Sec. 1.00)
for review of its electric)
restructuring proposal) D.P.U. 96-25

Pursuant to the regulations of the Department of Public Utilities ("Department"), 220 C.M.R. 1.03(1), Green Mountain Energy Partners, L.L.C. ("GMEP") respectfully petitions for leave to participate as a limited participant in the afore-captioned proceeding of Massachusetts Electric Company ("Company") and states in support thereof the following:

1. The name and principal address of Petitioner in the Commonwealth is Green Mountain Energy Partners, L.L.C., c/o Edward L. Selgrade, Esq., 200 Wheeler Road, Suite 400, Burlington, Massachusetts 01803.
2. Petitioner is a Limited Liability Company organized in the State of Delaware on April 22, 1996 and registered, on or about August 6, 1996, pursuant to Section 48 of Chapter 156C of the Massachusetts General Laws, as a foreign Limited Liability Company in the Commonwealth.
3. Petitioner currently participates, or has sought to participate, in pilot retail electric and gas competition programs pursuant to applicable Department orders.

4. Petitioner will be substantially and specifically affected by this proceeding in that this proceeding is likely to determine, in light of the offer of settlement filed by various parties on October 1, 1996 ("Settlement"), all major components of how electric restructuring will be applied in the service territory of the Company

5. The manner in which such components of restructuring are determined will significantly and specifically affect and influence the ability of Petitioner to engage in retail electric competition in the Company's service territory. As the first comprehensive settlement of all major issues arising from electric restructuring in the Commonwealth, the Settlement is likely to influence other electric, and perhaps also gas, companies in the Commonwealth and in other New England states. The Department's treatment of the Settlement could create precedents or examples which have effects on Petitioner's business.

6. The relief sought by Petitioner, pursuant to the Department's authority under Section 76 of Chapter 164, as the latter may be amended during the course of this proceeding, is to keep itself currently informed of the developments in this precedent-setting proceeding and to make comments and file briefs as may be prudent and necessary in its business judgment to influence the deliberations of the Department herein.

7. In light of the relief sought, MPLP seeks to participate as a limited participant pursuant to 220 CMR Section

1.03(1)(e) in this proceeding, and reserves the right, as may be appropriate, to attend and observe settlement discussions, technical sessions and hearings and to file comments and briefs in connection with these proceedings. Petitioner does not seek to file discovery, or be subject to discovery, to cross-examine witnesses, or be subject to examination, and to present testimony, or be called to testify.

WHEREFORE, Petitioner respectfully requests that the Department grant its petition for limited participation in the instant proceedings.

Respectfully submitted,

GREEN MOUNTAIN ENERGY PARTNERS, L.L.C

By its Attorney,

Edward L. Selgrade, Esq.
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Dated: October 28, 1996

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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

DPU 96-25

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 220 C.M.R. 1.05 of the Department's regulations, I have this day served, by overnight mail, the foregoing document upon the Department of Public Utilities and, by first class mail, upon Thomas G. Robinson, General Counsel, Massachusetts Electric Company.

Dated at Burlington, Massachusetts this 28th day of October, 1996.

Edward L. Selgrade, Esq.
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